

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA RECORDS CENTER
FACILITY Pratt & Whitney - Main St
I.D. NO. CTDA90672081
FILE LOC. R-1B
OTHER RDMS #2721

January 19, 1983

Mr. M. A. Andrew
Environmental Protection Group
Manufacturing Division
UTC - Pratt & Whitney
400 Main Street
East Hartford, CT 06108

Re: RCRA Facility CTD990672081

Dear Mr. Andrew:

In response to your letter of December 7, 1982, I offer the following information for the purpose of preparing the Part F permit application due by April 20, 1983.

The Federal exemption at 40 CFR 264.1(g)(6) for wastewater treatment tanks and elementary neutralization is clear on its face and I accept your representation of regulated units as shown in your attachment dated November 19, 1982. An amended Part A should reflect the current Federally regulated tank storage at your facility.

The second point concerning regulation of the Reclaim Area turns on whether Subpart F - listed wastes which are to be managed by the stills are from on-site or off-site.

For on-site waste, stored in tanks or containers which is reclaimed in less than 90 days from generation, 40 CFR 264 permit standards will not apply. However, certain interim status (40 CFR 265) requirements referenced at 40 CFR 262.34 would be applicable as required by the equivalent Phase I Standards in the current State of Connecticut Hazardous Waste Regulations.

If, however, the Reclaim Area will manage off-site wastes, including wastes from other Pratt & Whitney locations, the 90 day exemption does not apply and the Reclaim Area would be required to comply with the applicable standards found at 40 CFR 261.6(b)(1) - (6) inclusive.

CONCURRENCES								
SYMBOL	IAW							
SURNAME	Torney							
DATE	1/19/83							

I trust this information will allow you to complete the Part B application for the Main Street, East Hartford facility. Call me at (617)223-4448, if you have any further questions.

Sincerely,

William F. Torrey, III
Chemical Engineer
CT State Coordinator

cc: Ed Parker - CT DEP
George Dews - CT DEP

EPA:IWM:SWPE:W.TCPPEY:pjs:3-4448